

City of Portland, Oregon Bureau of Development Services

Land Use Services

FROM CONCEPT TO CONSTRUCTION

Chloe Eudaly, Commissioner Paul L. Scarlett, Director Phone: (503) 823-7300 Fax: (503) 823-5630 TTY: (503) 823-6868 www.portlandoregon.gov/bds

Date: March 17, 2017

To: Interested Person

From: Don Kienholz, Land Use Services

503-823-7771 / Don.Kienholz@portlandoregon.gov

NOTICE OF A TYPE II DECISION ON A PROPOSAL IN YOUR NEIGHBORHOOD

The Bureau of Development Services has approved a proposal in your neighborhood. The mailed copy of this document is only a summary of the decision.

The reasons for the decision are included in the version located on the BDS website http://www.portlandonline.com/bds/index.cfm?c=46429. Click on the District Coalition then scroll to the relevant Neighborhood, and case number. If you disagree with the decision, you can appeal. Information on how to do so is included at the end of this decision.

CASE FILE NUMBER: LU 16-266371 AD

GENERAL INFORMATION

Applicant: Deborah K. Kohl

13420 SE Claybourne St. Portland, OR 97236-4509

Site Address: 13420 SE CLAYBOURNE ST.

Legal Description: N 167.5' OF E 72.75' OF W 175.5' OF LOT 28 EXC PT IN ST.

LAMARGENT PK NO 2

Tax Account No.: R466208480 **State ID No.:** 1S2E23AB 07500

Quarter Section: 3744

Neighborhood: Pleasant Valley, contact Steve Montgomery at foxtrotlove@hotmail.com.

Business District: None

District Coalition: East Portland Neighborhood Office, contact Richard Bixby at 503-823-

4550.

Plan District: Johnson Creek Basin - South

Zoning: R10a – Residential 10,000 base zone with an Alternative Design

Density ("a") overlay zone.

Case Type: AD – Adjustment Review

Procedure: Type II, an administrative decision with appeal to the Adjustment

Committee.

Proposal:

The site is developed with a one-story single-family dwelling constructed in 1977, which has been altered with a 8'9"x5-foot one-story addition featuring a picture window on the west side of the house. The house was built while within unincorporated Multnomah County and later annexed into the City of Portland after 1991. While a building permit is on record for the house, there are no building permit records for the addition. As a result, it is unknown when the

addition was completed. When the neighborhood and site were annexed, the City placed them within the R10 zoning district which has minimum 10-foot side building setbacks (Portland Zoning Code section 33.110.220). A complaint regarding the unpermitted addition was received by the City and through the investigation it was discovered the addition is only 6-feet 8-inches from the western side property line. Because the addition was not permitted when originally constructed, it must meet current zoning requirements under Oregon's 'Goal Post Rule' in ORS 127.178(3). Therefore, the applicant is requesting an Adjustment to allow the addition to encroach 3-feet 4-inches into the 10-foot side building setback.

Relevant Approval Criteria:

In order to be approved, this proposal must comply with the approval criteria of Title 33. Adjustment requests will be approved if the review body finds that the applicant has shown the Adjustment approval criteria A. through F. of Section 33.805.040 have been met.

ANALYSIS

Site and Vicinity: The subject site is zoned R10 and has an existing one-story dwelling constructed in 1977. The lot is 10,003 square feet with the existing house setback 25-feet from the front property line, 6-feet 8-inches from the west side property line, 10-feet 4-inches from the east property line and 60-feet 4-inches from the rear property line. A 7-foot tall sight obscuring fence runs along the west property line. The immediate vicinity is generally made up of larger lots of approximately 10,000 square feet and homes constructed between 1970 and 1990 typical of more suburban environments. The site has several large trees established in the front and rear yards.

Zoning: The Residential 10,000 zone (R10), is a Single-Dwelling zone intended to preserve land for housing and to provide housing opportunities for individual households. The zone implements the comprehensive plan policies and designations for single-dwelling housing. Minimum lot size is 6,000 square feet, with minimum width and depth dimensions of 50 and 60-feet, respectively. Minimum densities are based on lot size and street configuration. Maximum densities are 1 lot per 10,000 square feet of site area.

The purpose of the Alternative Design Density Overlay Zone ('a') is to focus development on vacant sites, preserve existing housing and encourage new development that is compatible with and supportive of the positive qualities of residential neighborhoods. The concept for the zone is to allow increased density for development that meets additional design compatibility requirements.

The Johnson Creek Basin plan district provides for the safe, orderly, and efficient development of lands which are subject to a number of physical constraints, including significant natural resources, steep and hazardous slopes, flood plains, wetlands, and the lack of streets, sewers, and water services. At certain locations, the density of development is limited by applying special regulations to new land division proposals. In addition, restrictions are placed on all new land uses and activities to reduce stormwater runoff, provide groundwater recharge, reduce erosion, enhance water quality, and retain and enhance native vegetation throughout the plan district. At other locations, development is encouraged and mechanisms are included that provide relief from environmental restrictions. This plan district is intended to be used in conjunction with environmental zoning placed on significant resources and functional values in the Johnson Creek basin, to protect resources and functional values in conformance with Goal 8 of the Comprehensive Plan and Statewide Planning Goal 5.

Land Use and Property History: City records indicate there are no prior land use reviews for this site.

Building permits are on record for the 1977 dwelling but no permits are on record for the 8'9"x5-foot addition on the western side of the dwelling. The house was built while in unincorporated Multnomah County and zoned R10 with 10-foot building side setbacks. The property was annexed into the City of Portland after 1991 and was zoned R10 by the City as

well, with a similar 10-foot side building setback. Building permits for additions to dwellings on this site have been required since 1955 under the County's building and zoning codes and since 1991 after being annexed to the City under the City's building and zoning codes.

A code compliance complaint was received against the subject property in 2016 for the unpermitted addition and a Notice of Zoning and Building Violations was sent to the property owner. The property owner was given the option to either remove the addition and place the house back into its last lawful configuration; or, using the options in the current zoning code, seek approval through an Adjustment, a discretionary land use review, to encroach into the setback by demonstrating the proposal equally meets the purpose of the minimum setback regulation. If the Adjustment is denied, then the addition would need to be removed. This application is a result of that Notice of Violation.

Agency Review: A "Notice of Proposal in Your Neighborhood" was mailed **January 6, 2017**. The following Bureaus have responded with no issues or concerns:

- Bureau of Environmental Services (Exhibit E.1);
- Bureau of Transportation Engineering (Exhibit E.2);
- Water Bureau (Exhibit E.3);
- Fire Bureau (Exhibit E.4); and
- Site Development (Exhibit E.5).

The Life Safety Section of BDS responded (Exhibit E.6) with comments noting a separate building permit is required for the 8'9"x5-foot addition to close the compliance case 16-212484.

Neighborhood Review: One written response has been received from a notified property owner in response to the proposal. The response included concerns related to the applicable approval criteria such as concerns over privacy which is addressed through Staff's findings below. Other concerns raised in the letter, such as inequitable code compliance enforcement, safety, conflict with the neighbor and fees paid out to the City, are not listed under the approval criteria applicable to this land use review.

ZONING CODE APPROVAL CRITERIA

Title 33.805.010 Purpose (Adjustments)

The regulations of the zoning code are designed to implement the goals and policies of the Comprehensive Plan. These regulations apply city-wide, but because of the city's diversity, some sites are difficult to develop in compliance with the regulations. The adjustment review process provides a mechanism by which the regulations in the zoning code may be modified if the proposed development continues to meet the intended purpose of those regulations. Adjustments may also be used when strict application of the zoning code's regulations would preclude all use of a site. Adjustment reviews provide flexibility for unusual situations. They also allow for alternative ways to meet the purposes of the code, while allowing the zoning code to continue to provide certainty and rapid processing for land use applications.

33.805.040 Approval Criteria

A. Granting the adjustment will equally or better meet the purpose of the regulation to be modified; and

Finding: The applicant is requesting to retroactively approve an unpermitted addition with a picture window onto the dwelling that encroaches 3-feet 4-inches into the 10-foot side building setback. The addition was placed where a large picture window previously was located. The purpose of minimum building setbacks are listed in Portland Zoning Code Section 33.110.220.A:

- "A. Purpose. The setback regulations for buildings and garage entrances serve several purposes:
 - They maintain light, air, separation for fire protection, and access for fire-fighting;
 - They reflect the general building scale and placement of houses in the city's neighborhoods;
 - They promote a reasonable physical relationship between residences;
 - They promote options for privacy for neighboring properties;
 - They require larger front setbacks than side and rear setbacks to promote open, visually pleasing front yards;
 - They provide adequate flexibility to site a building so that it may be compatible with the neighborhood, fit the topography of the site, allow for required outdoor areas, and allow for architectural diversity; and
 - They provide room for a car to park in front of a garage door without overhanging the street or sidewalk, and they enhance driver visibility when backing onto the street." (**Emphasis** added to purpose statements applicable to building side setbacks)

The R10 zoning district supports a development pattern of lower density suburban and auto-oriented development typically found further from the city core. In the R10 zoning district, the normal by-right building pattern provides 20-feet between dwellings on adjacent lots. That 20-foot distance has been found to satisfy the purpose statements highlighted above.

The 8-foot long wall of the addition that is subject to this review is 6'8" from the western property line (Exhibit C.7). As seen in the 2016 air photo, the wall of the neighboring house immediately to the west is approximately 15.75-feet from the common property line, assuming a typical 2-foot eave. The combined distance between the walls of the two dwellings is approximately 22-feet, exceeding the 20-foot distance the code provides if both homes were built to the minimum 10-foot side yard setback. Even if the adjacent property owner was to extend their house closer to the side property line, a 7-foot tall sight-obscuring fence runs along the property line (Exhibit F.2) and three arborvitae bushes are planted between the addition and the property line. Staff finds the current distance between the homes equally meets the minimum distance required by the zoning code by-right.

The proposed addition is a single story and as such, there is no impediment to sunlight or air reaching the space between the house and fence of the subject property year round due to the angle of the sun. Additionally, the single-story addition will not impede sunlight or air from reaching the house or side yard on the lot adjacent to the west. While safety is not explicitly listed under the purpose statement of the setbacks, it is related to the ability to provide access to fire personnel and fire suppression. A gap of 6'8" provides enough space for a fire-fighter to pass between the proposed addition and fence along the property line to reach the back yard, including with typical fire hoses or equipment. Additionally, the 22-feet of distance between the addition subject to this review and the house on the adjacent lot to the west will help prevent fire from spreading between the two structures should one catch on fire. Lastly, the Fire Bureau had no concerns with the proposal (Exhibit E.4). Staff finds that the proposed reduction to the setback equally meets the purpose of setbacks to provide air and light as well as separation for fire and access for fire-fighting and related safety issues.

Properties along the south side of SE Claybourne to the east all have houses facing north like the subject lot. Staff measured distances between the homes on the City's GIS maps and found the distances between homes ranges from a low of approximately 15-feet between 13452 SE Claybourne and 13528 SE Claybourne to a high of approximately 28-feet between 13528 SE Claybourne and 13530 SE Claybourne. Other homes typically had distances between houses of approximately 20-feet. Additionally, other homes in the immediate vicinity zoned R10 have side building setbacks to property lines less than 10-feet, such as 6607 SE 143th, 6625 SE 134th, 6638 SE 134th, 6726 SE 134th, 13452 SE

Claybourne, 13528 SE Claybourne, and 13552 SE Claybourne. Based on the evidence above, the proposed addition's setback of 6'8" and distance to the adjacent house to the west of approximately 22-feet would equally meet the purpose of the setback requirement and reflect the development pattern (Exhibit G.7), general scale, placement of homes and physical relationship between homes of the neighborhood.

Lastly, setbacks provide privacy. The letter received during the comment period raised the concern that the reduced setback could adversely impact privacy. The addition subject to this review is where a large picture window once was located on the wall, so visual sight lines were previously in place between the subject property and the lot to the west.

The distance between the proposed addition and the house on the adjacent lot to the west is approximately 22-feet wall to wall, further than if the addition and the house on the lot to the west both met the 10-foot minimum side building setback. For all practical purposes, there is no substantive difference in privacy from what would be allowed by-right and what is proposed. That said, there is a 7-foot tall, fully sight-obscuring privacy fence between the proposed addition and the dwelling to the west as seen in photos provided by the neighbor (Exhibits F.2, F.4 and F.5). The fence provides additional privacy beyond what an open 20-foot distance would provide if both houses met the minimum side building setback. Finally, the applicant notes in their December 28, 2016 Narrative (Exhibit A.2) that they have planted three arborvitae bushes between the addition and the privacy fence as seen in the site plan in Exhibit C.7.

Taken as a whole and with conditions of approval, the proposal equally meets the purpose of the side building setback.

Criterion met.

B. If in a residential zone, the proposal will not significantly detract from the livability or appearance of the residential area, or if in an OS, C, E, or I zone, the proposal will be consistent with the classifications of the adjacent streets and the desired character of the area; and

Finding: The property is zoned R10, a residential zone. As noted in the finding for criterion A above, the proposed 8'9"x5-foot addition matches the development pattern (Exhibit G.7) and relationship between homes in the immediate neighborhood, and therefore does not detract from the appearance of the residential area. A letter received during the comment period raised a concern over privacy because of the reduced setback and the impact on livability. But, as discussed in Finding A, the distance between the wall of the addition that encroaches 3'8" into the setback and the wall of the house across the property line is approximately 22-feet – further than if both homes were located the minimum setback of 10-feet from the property line. The reduced setback is only for the addition, which at 8'9" in length is approximately 19% of the total length of the approximately 46-foot long west facing wall. The other segments of the wall are more than 11-feet from the property line. Additionally, there is a 7-foot tall fully sight-obscuring fence along the property line separating the two houses. Lastly, the applicant has planted three arborvitae bushes between the addition and the fence which will provide another layer of sight-obscuring material and sound absorption that mitigates for the encroachment into the setback.

Criterion met.

C. If more than one adjustment is being requested, the cumulative effect of the adjustments results in a project which is still consistent with the overall purpose of the zone; and

Finding: Only one Adjustment was requested.

Criterion not applicable.

D. City-designated scenic resources and historic resources are preserved; and

Finding: City-designated scenic resources are identified on the Official Zoning Maps with a lower case "s," while historic resources are identified either with a dot or as being within the boundaries of a Historic or Conservation district. The subject property is not within a City-designated 's' overlay zone nor within proximity to an Historic Resource. Considering the lack of proximity to city-designated scenic and historic resources, staff finds development will not adversely impact scenic or historic resources and they will be preserved.

Criterion met.

E. Any impacts resulting from the adjustment are mitigated to the extent practical; and

Finding: The Adjustment request is to reduce the side building setback from 10-feet down to 6'8". In addition to the distance between the wall of the addition and the wall of the dwelling across the property line being approximately 22-feet, the reduction is mitigated by the presence of a 7-foot tall fence along the common property line and the property owner of the subject lot planting three arborvitae bushes between the addition and fence.

With conditions requiring the maintenance of the fence and arborvitae, the criterion is met.

F. If in an environmental zone, the proposal has as few significant detrimental environmental impacts on the resource and resource values as is practicable;

Finding: The subject property is not within an environmental zone.

Criterion not applicable.

DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all development standards of Title 33 can be met, or have received an Adjustment or Modification via a land use review prior to the approval of a building or zoning permit.

CONCLUSIONS

The applicant has demonstrated that the applicable approval criteria have been met for the requested Adjustment. The Adjustment equally meets the purpose of the Side Building Setback standards of 33.110.220.A for structures in the single-dwelling zones, will not significantly detract from the livability or appearance of the residential area, has no impact on historic resources, and any adverse impacts will be mitigated to the extent practicable.

ADMINISTRATIVE DECISION

Approval of reducing the side building setback (33.110.220.B) for an 8'9"x5-foot one-story addition on the west side of the house from 10-feet down to 6-feet 8-inches per the approved site plan Exhibit C.7, signed and dated March 15, 2017, subject to the following conditions:

A. As part of the building permit application submittal, each of the 4 required site plans and any additional drawings must reflect the information and design approved by this land use review as indicated in Exhibit C.7. The sheets on which this information appears must be labeled, "Proposal and design as approved in Case File # LU 16-266371 AD. No field changes allowed."

- B. Three arborvitae bushes shall be maintained in the west setback as identified on Exhibit C.7, and are subject to the Installation and Mitigation standards in 33.248.040.
- C. The 7-foot tall sight-obscuring fence along the western property line shall be maintained. Should it be removed, the property owner shall construct a new sight-obscuring fence measuring at least 6-feet in height along the property line.

Staff Planner: Don Kienholz

Decision rendered by: ______ on March 15, 2017

By authority of the Director of the Bureau of Development Services

Decision mailed: March 17, 2017

About this Decision. This land use decision is **not a permit** for development. Permits may be required prior to any work. Contact the Development Services Center at 503-823-7310 for information about permits.

Procedural Information. The application for this land use review was submitted on November 1, 2016, and was determined to be complete on December 28, 2016.

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on November 1, 2016.

ORS 227.178 states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant. In this case, the applicant requested that the 120-day review period be extended a total of 75-days. Unless further extended by the applicant, **the 120 days will expire on: July 11, 2017**

Some of the information contained in this report was provided by the applicant.

As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. The Bureau of Development Services has independently reviewed the information submitted by the applicant and has included this information only where the Bureau of Development Services has determined the information satisfactorily demonstrates compliance with the applicable approval criteria. This report is the decision of the Bureau of Development Services with input from other City and public agencies.

Conditions of Approval. If approved, this project may be subject to a number of specific conditions, listed above. Compliance with the applicable conditions of approval must be documented in all related permit applications. Plans and drawings submitted during the permitting process must illustrate how applicable conditions of approval are met. Any project elements that are specifically required by conditions of approval must be shown on the plans, and labeled as such.

These conditions of approval run with the land, unless modified by future land use reviews. As used in the conditions, the term "applicant" includes the applicant for this land use review, any person undertaking development pursuant to this land use review, the proprietor of the use or development approved by this land use review, and the current owner and future owners of the property subject to this land use review.

Appealing this decision. This decision may be appealed to the Adjustment Committee, which will hold a public hearing. Appeals must be filed **by 4:30 PM on March 31, 2017** at 1900 SW Fourth Ave. Appeals can be filed at the 5th floor reception desk of 1900 SW 4th Avenue Monday through Friday between 8:00 am and 4:30 pm. **An appeal fee of \$250 will be charged**. The appeal fee will be refunded if the appellant prevails. There is no fee for ONI recognized

organizations appealing a land use decision for property within the organization's boundaries. The vote to appeal must be in accordance with the organization's bylaws. Assistance in filing the appeal and information on fee waivers is available from BDS in the Development Services Center. Please see the appeal form for additional information.

The file and all evidence on this case are available for your review by appointment only. Please call the Request Line at our office, 1900 SW Fourth Avenue, Suite 5000, phone 503-823-7617, to schedule an appointment. I can provide some information over the phone. Copies of all information in the file can be obtained for a fee equal to the cost of services. Additional information about the City of Portland, city bureaus, and a digital copy of the Portland Zoning Code is available on the internet at www.portlandonline.com.

Attending the hearing. If this decision is appealed, a hearing will be scheduled, and you will be notified of the date and time of the hearing. The decision of the Adjustment Committee is final; any further appeal must be made to the Oregon Land Use Board of Appeals (LUBA) within 21 days of the date of mailing the decision, pursuant to ORS 197.620 and 197.830. Contact LUBA at 775 Summer St NE, Suite 330, Salem, Oregon 97301-1283, or phone 1-503-373-1265 for further information.

Failure to raise an issue by the close of the record at or following the final hearing on this case, in person or by letter, may preclude an appeal to the Land Use Board of Appeals (LUBA) on that issue. Also, if you do not raise an issue with enough specificity to give the Adjustment Committee an opportunity to respond to it, that also may preclude an appeal to LUBA on that issue.

Recording the final decision.

If this Land Use Review is approved the final decision must be recorded with the Multnomah County Recorder. A few days prior to the last day to appeal, the City will mail instructions to the applicant for recording the documents associated with their final land use decision.

• Unless appealed, The final decision may be recorded on or after **April 1, 2017 – the first business day following the close of the appeal period.** A building or zoning permit will be issued only after the final decision is recorded.

The applicant, builder, or a representative may record the final decision as follows:

- By Mail: Send the two recording sheets (sent in separate mailing) and the final Land Use Review decision with a check made payable to the Multnomah County Recorder to: Multnomah County Recorder, P.O. Box 5007, Portland OR 97208. The recording fee is identified on the recording sheet. Please include a self-addressed, stamped envelope.
- In Person: Bring the two recording sheets (sent in separate mailing) and the final Land Use Review decision with a check made payable to the Multnomah County Recorder to the County Recorder's office located at 501 SE Hawthorne Boulevard, #158, Portland OR 97214. The recording fee is identified on the recording sheet.

For further information on recording, please call the County Recorder at 503-988-3034 For further information on your recording documents please call the Bureau of Development Services Land Use Services Division at 503-823-0625.

Expiration of this approval. An approval expires three years from the date the final decision is rendered unless a building permit has been issued, or the approved activity has begun.

Where a site has received approval for multiple developments, and a building permit is not issued for all of the approved development within three years of the date of the final decision, a new land use review will be required before a permit will be issued for the remaining development, subject to the Zoning Code in effect at that time.

Applying for your permits. A building permit, occupancy permit, or development permit may be required before carrying out an approved project. At the time they apply for a permit, permittees must demonstrate compliance with:

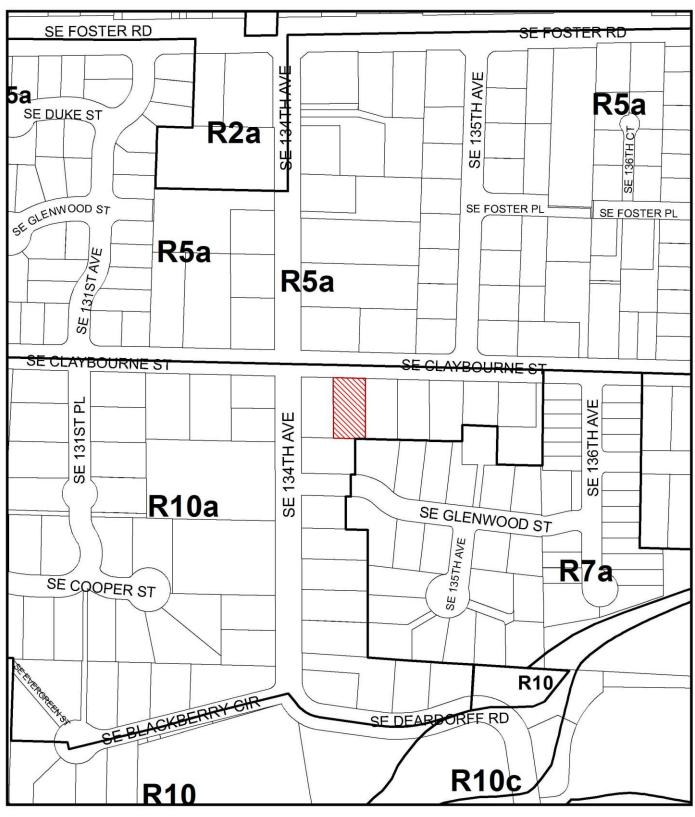
- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations of the City.

EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Information
 - 1. Applicant's November 1, 2016 Narrative
 - 2. Applicant's December 28, 2016 Narrative
- B. Zoning Map (Attached)
- C. Plans/Drawings:
 - 1. November 1, 2016 Site Plan
 - 2. November 1, 2016 West Elevation Plan
 - 3. November 1, 2016 Framing Plan
 - 4. November 1, 2016 Second Elevation Drawing
 - 5. November 1, 2016 Foundation Detail
 - 6. November 1, 2016 Floor Plan
 - 7. December 28, 2016 Site Plan (Attached)
- D. Notification information:
 - 1. Mailing List
 - 2. Mailed Notice
- E. Agency Responses:
 - 1. Bureau of Environmental Services
 - 2. Bureau of Transportation Engineering and Development Review
 - 3. Water Bureau
 - 4. Fire Bureau
 - 5. Site Development Review Section of BDS
 - 6. Life Safety
- F. Correspondence:
 - 1. Barbara Gardner, January 23, 2017. The letter was in opposition and raised concerns over privacy, safety, inequitable code compliance enforcement, conflict with the neighbor and fees paid out to the City. The letter also included the following pictures:
 - 2. Submitted photo of 7-foot, sight-obscuring fence looking east with narrative.
 - 3. Submitted photo looking west of neighbor's window directly across from proposed addition with reflection of fence in window with narrative.
 - 4. Submitted photo looking south of neighbor's back yard with sight-obscuring fence with narrative.
 - 5. Submitted photo looking north at neighbors side yard and sight-obscuring fence with narrative.
 - 6. Submitted photocopy of Portland Police officers' business cards from police visits.
- G. Other:
 - 1. Original LU Application
 - 2. Applicant's request to extend statutory clock 75-days received November 30, 2017.
 - 3. November 16, 2016 incomplete letter.
 - 4. February 15, 2017 Letter of Comment Received.
 - 5. 2016 air photo measuring distance from the wall of the addition to the wall of the neighbor's house on lot to west as approximately 21.9-feet.
 - 6. 2016 air photo measuring distance between sight-obscuring fence on property line to the wall of neighbor's house to the west as approximately 15.75-feet.
 - 7. Air Photo Depicting Development Pattern of the Vicinity and R10 Zone.

The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).



ZONING

Site

File No. LU 16-266371 AD

1/4 Section 3744

Scale 1 inch = 200 feet

State_Id 1S2E23AB 7500

Exhibit B (Nov 04, 2016)



